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Attorneys for Plaintiff

FILED
ENTERED
JAN 28 2016
CLERK US DISTRICT COURT DISTRICT OF NEVADA
BY: _____

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

FRANCES M. WEEKS-ANDEREGG,  
Plaintiff,

vs.

KATHRYNNE ALEXINE MCPHERSON;  
UNITED STATES OF AMERICA; CIVIL AIR  
PATROL FOUNDATION, INC, an Alabama  
Domestic Non-Profit Corporation d/b/a CIVIL AIR  
PATROL, INC.,  
Defendants.

CASE NO. 2:15-cv-01208-GMN-CWH

**STIPULATION AND ORDER TO  
EXTEND THE TIME TO FILE THE  
STIPULATED DISCOVERY  
PLAN/STIPULATED ORDER  
(FIRST REQUEST)**

Plaintiff FRANCES M. WEEKS-ANDEREGG and Defendant UNITED STATES OF AMERICA, by and through their respective attorneys, submit this Stipulation and Order to Extend the Time to File the Stipulated Discovery Plan/Stipulated Order, pursuant to Local Rules 6-1 and 7-1. The Discovery Plan/Scheduling Order is due by January 28, 2016. The parties propose a thirty (30) day extension of time to February 29, 2016. This is the parties' first request, and the same is not interposed for purposes of delay, but rather for the sole purpose of allowing the parties to thoroughly discuss the issues in this case and to come to an agreed upon discovery plan.

**PREFATORY REMARKS**

This case arises from a motor vehicle collision occurring on January 24, 2011 on Carey Avenue in Clark County, Nevada. Plaintiff alleges that Kathrynne Alexine McPherson, who was

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1 in the course and scope of her employment with the United States of America and/or Civil Air  
2 Patrol, failed to yield the right-of-way while attempting to turn left into a private drive in front of  
3 Plaintiff's vehicle causing the motor vehicle collision.  
4

5 It was necessary for Plaintiff's counsel, Steve Baker, to take an unexpected extended  
6 medical leave of absence beginning on or about November 23, 2015. Plaintiff's counsel is  
7 scheduled to return from leave and resume the day-to-day handling of his files on Monday,  
8 February 1, 2016.

9 Defendant's counsel, Patrick A. Rose, is currently engaged in trial preparation and has  
10 trial scheduled on February 2, 3, and 10, 2016.

11 In light of Mr. Baker's unexpected extended medical leave and Mr. Rose's trial  
12 preparation and schedule, counsel has not had the opportunity to thoroughly discuss the issues at  
13 hand. An extension of time to file the Stipulated Discovery Plan/Stipulated Order Submitted in  
14 Compliance with LR26-1(c) would provide counsel with an opportunity to do so.

15 DATED this 27<sup>th</sup> day of January, 2016.

16 BENSON, BERTOLDO, BAKER  
17 & CARTER

UNITED STATES ATTORNEY'S OFFICE

18 By /s/ Steven M. Baker  
19 STEVEN M. BAKER, ESQ.  
20 Nevada Bar No. 4522  
21 7408 W. Sahara Avenue  
22 Las Vegas, NV 89117  
23 Attorney For Plaintiff

By /s/ Patrick A. Rose  
PATRICK A. ROSE, ESQ.  
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333 Las Vegas Blvd., South, Suite 5000  
Las Vegas, NV 89101  
Attorney For Defendant

24 IT IS SO ORDERED.

25 DATED this 28<sup>th</sup> day of Jan, 2016.

26   
27 UNITED STATES MAGISTRATE JUDGE  
28